

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Mailing Online Service )

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: MICHAEL K. PLUNKETT  
(OCA/USPS-T5-17-23)  
(July 31, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,

*Gail Willette*

Gail Willette  
Acting Director  
Office of the Consumer Advocate

*Emmett Rand Costich*

Emmett Rand Costich  
Acting Assistant Director



OCA/USPS-T5-17. Please refer to USPS-T-5, Exhibit B.

- a. For 1999, please confirm that the envelope cost for "Letter Size Pieces" is \$108,308. If you do not confirm, please explain.
- b. For 1999, please confirm that the price of a No. 10 envelope, with a logo and no window, is \$0.027248. See USPS-T-2, Exhibit A, Table 16, at 28. If you do not confirm, please explain.
- c. For 1999, please confirm that the envelope cost for "Letter Size Pieces" is \$7,087,110 (260,096,523x\$0.027248). If you do not confirm, please explain.
- d. For 1999, please confirm that the price of a No. 10 envelope, with a logo and no window, as shown in Exhibit B would be \$0.000416416. (\$108,308/260,096,523). If you do not confirm, please explain.
- e. Please show the derivation of the price of a No. 10 envelope, with a logo and no window, referred to in part (d) of this interrogatory.

OCA/USPS-T5-18. Please refer to USPS-T-5, Exhibit B.

- a. For 1999, please confirm that the envelope cost for "Flat Size Pieces" is \$1,672,832. If you do not confirm, please explain.
- b. For 1999, please confirm that the price of a flat-sized (9x12) envelope, with a logo and no window, is \$0.0677976. See USPS-T-2, Exhibit A, Table 16, at 28. If you do not confirm, please explain.
- c. For 1999, please confirm that the envelope cost for "Flat Size Pieces" is \$2,409,455 (35,538,936x\$0.0677976). If you do not confirm, please explain.

- d. For 1999, please confirm that the price of a flat-sized (9x12) envelope, with a logo and no window, as shown in Exhibit B would be \$0.0470704.  
(\$1,672,832/35,538,936). If you do not confirm, please explain.
- e. Please show the derivation of the price of a flat-sized (9x12) envelope, with a logo and no window, referred to in part (d) of this interrogatory.

OCA/USPS-T5-19. Please refer to USPS-T-5, Exhibit B.

- a. Please confirm that the "Total Cost" for envelopes is \$1,781,140. If you do not confirm, please explain.
- b. Please confirm that the "Total Cost" for envelopes should be \$9,496,565 (\$7,087,110+\$2,409,455). If you do not confirm, please explain.

OCA/USPS-T5-20. Please refer to USPS-T-5, Exhibit A. Please confirm that prices shown in Exhibit A are "Sample Mailing Online Prices" for the year 1999. If you do not confirm, please explain.

OCA/USPS-T5-21. Please refer to USPS-T-5, Exhibit A, and the column "Envelope Costs."

- a. Please confirm that the envelope costs for a 2 Page, 8.5x11, Simplex, Black & White, First-Class mail piece, and a 5 Page, 8.5x11, Simplex, Spot Color, Standard (A) mail piece is \$0.000. If you do not confirm, please explain.

- b. Please confirm that the envelope costs for a 2 Page, 8.5x11, Simplex, Black & White, First-Class mail piece, and a 5 Page, 8.5x11, Simplex, Spot Color, Standard (A) mail piece, should be \$0.027248. If you do not confirm, please explain.

OCA/USPS-T5-22. Please refer to USPS-T-5, Exhibit A, and the column "Envelope Costs."

- a. Please confirm that the envelope costs for a 10 Page, 8.5x14, Duplex, Black & White, First-Class mail piece, and a 22 Page, 8.5x14, Duplex, Spot color, First-Class mail piece, is \$0.04499. If you do not confirm, please explain.
- b. Please explain the rationale for using the "Base - 1998" price of \$0.04499 for a flat-sized (9x12) envelope, with no logo and no window in Exhibit A, when Exhibit B uses the "Prices - 1999" of \$0.0677976 for a flat-sized (9x12) envelope, with a logo and no window.
- c. Please confirm that the envelope costs for a 10 Page, 8.5x14, Duplex, Black & White, First-Class mail piece, and a 22 Page, 8.5x14, Duplex, Spot color, First-Class mail piece, should be \$ 0.0467896. If you do not confirm, please explain.

OCA/USPS-T5-23. Please refer to USPS-T-5, Exhibit A, "Example 2," "Postage" column. The First-Class postage for a 10-page document as \$0.74.

- a. Please explain how this postage figure was calculated.

- b. Assuming that the piece weighs 3 ounces, please confirm that the postage *should* be calculated by adding a 1-ounce automation-presort rate of 27 cents to 44 cents for an additional 2 ounces (2 x 22 cents). If you do not confirm, please explain.
- c. If you did assume that such a piece would weigh 3 ounces, how was it determined that this was an accurate assumption? Please set forth the formula used to estimate the weights of pieces considered in Exhibit A.

#### CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



Emmett Rand Costich  
Attorney

Washington, D.C. 20268-0001  
July 31, 1998